

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SAINT JOSEPH DIVISION**

JACOB INGERSOLL, RICHARD A. TRUITT,
JOSHUA TIEDEMANN, ANTHONY ARZOLA,
and CONSUELO ARZOLA on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

FARMLAND FOODS, INC.,

Defendant.

Civil No. 5:10-cv-06046-REL

JOINT STATUS REPORT

Plaintiffs Jacob Ingersoll, Joshua Tiedemann, Anthony Arzola, and Consuelo Arzola (“Plaintiffs”) and Defendant Farmland Foods, Inc. (“Farmland”), by and through their respective undersigned counsel and pursuant to this Court’s May 10, 2012 Order, jointly submit the following Status Report regarding the status of discovery.

Class counsel and Farmland’s counsel agree that Farmland will produce the agreed upon electronic personnel and wage data from its electronic databases in good faith on a rolling basis by July 20, 2012. Class counsel and Farmland’s counsel have been conferring regarding what information to include in those reports. Class counsel and Farmland’s counsel will promptly present any disputed issue to the Court by letter regarding what information to include.

On May 25, 2012, Farmland agreed to make paper wage records and hardcopy personnel files for the class members available for Plaintiffs’ inspection and copying pursuant to Fed. R. Civ. P. 34.

The parties have agreed to address any additional discovery regarding class members

who are not Named Plaintiffs after the production of personnel and wage records and Plaintiffs' counsel has had a reasonable opportunity to review the same.

On May 23, 2012, Farmland's counsel sent Plaintiff's counsel a letter explaining that Plaintiffs' counsel may be present at the Milan facility to observe when Farmland's potential time study expert obtains any video recordings or measurements at the plant for any time studies Farmland may use in this case, provided certain conditions are agreed upon in advance by the parties. Plaintiffs' counsel will be responding to that letter shortly.

Respectfully submitted this 4th day of June, 2012.

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